



**DEPARTMENT OF THE NAVY**  
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WASHINGTON DC 20350-3000

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MCSC (PMM-152)  
24 May 2021

MARINE CORPS ORDER 8020.14A

From: Commandant of the Marine Corps  
To: Distribution List

Subj: MARINE CORPS EXPLOSIVES SAFETY COMPLIANCE PROGRAM (ESMP)

Ref: (a) SECNAVINST 5100.10L  
(b) MCO 5100.29C  
(c) DESR 6055.09 Defense Explosives Safety Regulation,  
Edition 1, 13 Jan 2019  
(d) NAVSEA OP 5 Vol.1  
(e) CJCSI 4360.01B, "Explosives Safety and Munitions Risk  
Management for Joint Operations Planning, Training,  
and Execution," 31 August 2018  
(f) MCO 5530.14A  
(g) MCO 11000.12

Encl: (1) Explosives Safety Compliance Program Guidance

1. Situation. The Explosives Safety Compliance Program provides guidance, policy development, and compliance oversight for the conduct of Marine Corps explosives safety inspections, evaluations and audits, to ensure compliance with Department of Defense (DoD) and Department of the Navy (DON) explosives safety standards as directed by references (a) through (d).

2. Cancellation. MCO 8020.14

3. Mission. This Order provides policy and procedural guidance for the implementation of the Marine Corps Explosives Safety Compliance Program in support of the Marine Corps Explosives Safety Management Program (ESMP). The Program ensures explosives safety regulatory compliance in accordance with references (b) through (g) and identifies specific command responsibilities. Policy and procedural guidance are contained in enclosure (1).

DISTRIBUTION STATEMENT A: Approved for public release;  
distribution is unlimited.

#### 4. Execution

##### a. Commander's Intent and Concept of Operations

(1) Commander's Intent. The intent of this Order is to provide procedures to evaluate explosives safety compliance with the standards set forth by the DoD. Strict adherence to explosives safety standards enhances force and asset preservation by minimizing explosives mishaps that may result in death, serious injury, and the loss of materiel assets. The desired end state is to establish a formal Marine Corps Explosives Safety Compliance Program that will ensure full implementation of the Marine Corps ESMP and compliance with DoD standards.

(2) Concept of Operations. This Order pertains to the execution and management of the Marine Corps Explosives Safety Compliance Program. It addresses the responsibilities and tasks required to implement, execute, and maintain the program, as well as provide policy guidance on the following:

- (a) Explosives Safety Inspections (ESI)
- (b) Explosives Safety Compliance Reviews (CR)
- (c) ESMP Evaluations
- (d) Explosives Safety Self Assessments
- (e) Munitions Response Site (MRS) Audits

b. Subordinate Element Tasks. Commanding officers of inspected commands that conduct ammunition and explosives handling operations, storage operations, or munitions response actions shall implement and ensure compliance with the intent of the references and the contents of this Order.

#### 5. Administration and Logistics

a. Recommendations. Recommendations and correspondence concerning the contents of this Order may be forwarded to COMMARCORSYSCOM, PM AMMO (PMM-152), Environmental and Explosives Safety Branch via the appropriate chain-of-command.

b. Records Management. Records created as a result of this directive shall be managed according to National Archives and Records Administration (NARA)-approved dispositions per SECNAV

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M-5210.1 CH-1 to ensure proper maintenance, use, accessibility and preservation, regardless of format or medium. Records disposition schedules are located on the Department of the Navy/Assistant for Administration (DON/AA), Directives and Records Management Division (DRMD) portal page at: <https://portal.secnav.navy.mil/orgs/DUSNM/DONAA/DRM/Records-and-Information-Management/Approved%20Record%20Schedules/Forms/AllItems.aspx>  
Refer to MCO 5210.11F for Marine Corps records management policy and procedures.

c. Privacy Act. Any misuse or unauthorized disclosure of Personally Identifiable Information (PII) may result in both civil and criminal penalties. The Department of the Navy (DON) recognizes that the privacy of an individual is a personal and fundamental right that shall be respected and protected. The DON's need to collect, use, maintain, or disseminate PII about individuals for purposes of discharging its statutory responsibilities shall be balanced against the individuals' right to be protected against unwarranted invasion of privacy. All collection, use, maintenance, or dissemination of PII shall be in accordance with the Privacy Act of 1974, as amended (5 U.S.C. 552a) and implemented per SECNAVINST 5211.5F.

6. Command and Signal

a. Command. This Order is applicable to the Marine Corps Total Force.

b. Signal. This Order is effective the date signed.



A. J. PASAGIAN  
Commander  
Marine Corps Systems Command  
By direction

DISTRIBUTION: PCN 10210540800

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## Chapter 1

### Roles and Responsibilities

1. Background. The Marine Corps continuously trains and deploys with military munitions. The storage, handling, transportation, munitions response, and employment of these items are inherently hazardous. Therefore, it is imperative that an effective ESMP designed to minimize potential hazards of ammunition and explosives (A&E) be aggressively pursued at all levels. In accordance with Volume 8 of reference (b), the Marine Corps will establish and maintain an effective process to validate environmental and explosives safety compliance and the integration of munitions risk management per the requirements of references (b) through (f). This encompasses a means to inspect and assess Marine Corps installations, operational commands, and DoD contractors providing A&E related products and services aboard Marine Corps installations.

2. Responsibilities. An effective Explosives Safety Compliance Program is dependent upon command support at all levels. The responsibilities listed below outline the major aspects of the Explosives Safety Compliance Program, but may not be all-inclusive.

a. Commandant of the Marine Corps Safety Division (CMC SD)

(1) Provides overall administration of the Marine Corps Safety Program.

(2) CMC (SD) has designated the Commander, Marine Corps Systems Command (COMMARCORSYSCOM) responsibilities for implementation of the Marine Corps ESMP and execution of the Explosives Safety Compliance Program per reference (b).

b. Deputy Commandant for Combat Development and Integration (DC CD&I). Serve as the Marine Corps single point of contact for range operations involving the use of Class V material as it pertains to explosives safety.

c. Deputy Commandant, Plans, Policy, and Operations (Physical Security) (DC PP&O, PS). Serve as the Marine Corps single point of contact for the Physical Security Program and conduct Physical Security Surveys on behalf of the installation commander per reference (f).

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d. Deputy Commandant for Aviation (DC(A)) Aviation Logistics (ASB-30)

(1) Serve as the single point of contact for aviation operations explosives safety as delegated by CMC SD to include Class V(A) ordnance safety, and operational use of Class V(A) ordnance in aircraft operating areas (AOA).

(2) Coordinate with COMMARCORSYSCOM in assigning a Fleet Marine Representative (FMR) to assist in executing the Marine Corps Explosives Safety Compliance Program for Marine Corps Air Stations.

e. Marine Corps Component Commanders

(1) Ensure operational explosives safety criteria, Explosives Safety and Munitions Risk Management Assessments (ESMRMA) within respective areas of responsibility (AOR) are conducted in compliance with explosives safety criteria per reference (e). ESMRMA will be evaluated per Chapter 5 of this Order.

(2) COMMARFORRES. Administer the ESMP and provide Explosives Safety Compliance Program management and oversight functions for Marine Reserve activities.

f. Commander, Marine Corps Installation Command (MCICOM) will coordinate and facilitate the requirements detailed in this order as they pertain to installations.

g. Commander, Marine Corps Systems Command (COMMARCORSYSCOM)

(1) Assess Marine Corps installations, operational commands, and DoD contractors providing A&E related products and services aboard Marine Corps installations where A&E is handled or stored to validate compliance with appropriate policy and criteria.

(2) Schedule and conduct Explosives Safety Inspection-Compliance Reviews (ESI-CR), Re-inspections of unsatisfactory activities, Munitions Response Site (MRS) Audits, ESMRMA audits, ESMP Evaluations and close-out inspections of explosives storage facilities being transferred from DoD control.

(3) Assess command compliance utilizing applicable explosives safety related references. In addition, provide the

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command with a documented evaluation of the effectiveness and overall posture of its ESMP per Chapter 2, Explosives Safety Inspection Rating Criteria.

(a) In accordance with Volume 8 of reference (b) Non-Marine Corps tenants aboard Marine Corps installations will be inspected per Marine Corps criteria in consideration to formal agreements (Memorandum of Understanding (MOU), Memorandum of Agreement (MOA), and Inter-Service Support Agreement (ISSA)) in place. Marine Corps tenant commands aboard the property of another service or agency will be inspected per Marine Corps criteria in consideration to formal agreements in place.

(b) Inspections of Navy activities aboard Marine Corps installations will be coordinated between COMMARCORSYSCOM and Naval Ordnance Safety and Security Activity (NOSSA).

(4) Establish ESI-CR Team membership based on:

(a) Current ESI-CR Program requirements.

(b) The inspected command's mission and previous inspection CAPs.

(c) ESI-CR Schedule.

(d) Availability of qualified personnel.

(5) Notify each Command at least 45 days prior to the inspection to confirm team membership by name, rank/grade, function, and security clearance.

(6) Provide the Marine Corps Explosives Safety Evaluation Guide for commands to refer to in establishing and maintaining effective ESMP. Maintain the guide and post changes in the Marine Ammunition Knowledge Enterprise (MAKE) library under Environmental and Explosives Safety (EES).

(7) Maintain a database of explosives safety compliance generated data (program trends, information on inspected Commands, root cause analysis, etc.). Ensure all inspection reports, CAP, and related inspection correspondence are incorporated into the EES Web Portal and used to facilitate objective and informed policy and compliance decisions.



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(8) Issue an annual inspection schedule notification to the Commands being inspected/re-inspected, at least 90 days prior to the beginning of the Fiscal Year.

(9) As directed by Volume 8 of reference (b), the ESI-CR Team shall stop all observed unsafe A&E operations until unsafe conditions have been mitigated.

(10) In the event that the ESI-CR Team recommends an overall UNSATISFACTORY rating for an ESI-CR, notify the following:

(a) CMC (SD)

(b) COMMCICOM (Safety)

(c) DC(A) (ASB-30) for Marine Corps Air Stations

(d) CG TECOM (Safety) for Service Level Training Installations

(11) Issue the final inspection report to the inspected installation Commanding Officer within 30 calendar days of the out-brief with copies forwarded to CMC (SD), MCICOM, applicable Component Commander, and applicable chain of command. Additionally, forward copies of Marine Corps Air Station inspection reports to DC(A) (ASB-30) and Naval Supply Systems Command Ammunition Logistics Center (NALC). If a Navy Tenant command is inspected, a copy of the report will be forwarded to NOSSA (Code N9).

(12) Review and ensure that CAPs are submitted per Chapter 3.

(13) Provide qualified personnel to serve as inspectors for Program 10 (Inventory Management/Inventory Accuracy) at all Marine Corps activities that store Class V(W) A&E.

(14) Liaison with NALC to ensure qualified personnel serve as inspectors for Program 10 (Inventory Management/Inventory Accuracy) at Marine Corps activities that store Class V(A) A&E.

(15) Assign an FMR for Marine Corps ground activities.

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h. Commanding Generals, Marine Corps Installations (MCI)  
East/West/Pacific/National Capital Region

(1) Administer the Regional ESMP and provide Explosives Safety Compliance Program management and oversight functions for the installations within their respective regions.

(a) Ensure all commands are in compliance with explosives safety criteria per references (b) through (f), this Order, and other appropriate directives.

(b) MCI Regional Command Explosives Safety Offices will be evaluated per Chapter 4.

(2) Conduct and document Explosives Safety evaluations of the installations within the respective region not less than every 18 months.

(3) Participate in ESI-CRs within their respective region.

(4) The Regional Explosives Safety Officer (ESO) will review and recommend concurrence or non-concurrence with the installation CAP per Chapter 5. Ensure the CAP has accurate and acceptable root cause, root cause analysis, and corrective action, prior to submission to COMMARCORSYSCOM.

i. Naval Supply Systems Command Ammunition Logistics Center (NALC)

(1) Provide qualified personnel to serve as inspectors for Program 10 (Inventory Management/Inventory Accuracy) at Marine Corps activities that store Class V(A) A&E.

(2) Submit Class V(A) pertinent proposed modifications to the Program 10 (Inventory Management) portion of the Marine Corps Explosives Safety Evaluation Guide as needed or as requested to COMMARCORSYSCOM.

(3) Review and recommend concurrence or non-concurrence with the installation CAP per Chapter 5 for all Program 10 findings on Marine Corps Air Stations.

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j. Inspected Commands

(1) Comply with the provisions of references (b) through (f), this Order, and other appropriate directives in order to maintain and enhance the command's explosives safety posture.

(2) Maintain an active Explosives Safety Self-Assessment (ESSA) Program per Chapter 5.

(3) Coordinate the ESI-CR schedule, itineraries and inspection per Chapter 2 with COMMARCORSYSCOM, tenants, and Chain of Command as appropriate and provide the following:

(a) A copy of the command ESSA plan/instruction (provided at least 30 days prior to ESI-CR).

(b) In-brief date and time with activity Commanding Officer or designated representative.

(c) A command brief that includes an overview of deviations to explosives safety criteria, planned construction projects, Munitions Response Sites (MRS), and any significant A&E storage, handling, or environmental problem areas.

(4) Submit CAPs and associated updates to the Regional ESO via the EES web portal per Chapter 3.

(5) Submit preliminary ESI-CR documentation, post-ESI-CR data and CAP responses via the EES Web Portal.

## Chapter 2

### Explosives Safety Inspections (ESI)

1. Scope. Commands and their tenant activities that handle and store A&E shall receive a periodic ESI-CR per this Order. This chapter provides guidance on the conduct of the ESI portion of the ESI-CR at Marine Corps installations and activities.

2. Program Administration. The following applies to the conduct and administration of the Marine Corps ESI Program:

a. The ESI validates compliance with the following ten distinct explosives safety programs which are further subdivided into each program's respective functional elements:

- (1) Explosives Safety Administration/Management
- (2) Explosives Facility Certification/Master Planning
- (3) A&E Qualification/Certification
- (4) A&E Standard Operating Procedures
- (5) A&E Facilities
- (6) Lightning Protection/Grounding/Emissions Control
- (7) Munitions/Environmental Compliance
- (8) A&E Transportation and Equipment
- (9) A&E Operations
- (10) A&E Inventory Management

b. The Marine Corps Explosives Safety Evaluation Guide, comprised of these ten programs and functional elements, is available electronically in the MAKE library under EES. It provides a listing of key functional areas and selected explosives safety requirements that shall be employed by commands and ESI-CR Teams in assessing applicable explosives safety programs. The Explosives Safety Evaluation Guide is not all-inclusive; it does not contain a complete list of questions or references that may be part of the inspection. The guide serves as a baseline for inspectors and activities to prepare for, and conduct inspections and evaluations.

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c. The Explosives Safety Evaluation Guide will be updated regularly to provide current and accurate questions and associated reference citations. The guide will be revised/updated to appropriately address changes to explosives safety criteria and varying A&E operations and scenarios.

d. Except in cases of more stringent DoD, Chairman of the Joint Chiefs of Staff, or Secretary of the Navy (SECNAV) guidance, Marine Corps Orders and directives take precedence in the event of conflicting regulatory guidance.

e. ESI Team membership may consist of:

(1) Lead Inspector. The designated COMMARCORSYSCOM representative responsible for the team, conduct, coordination, and execution of the inspection.

(2) Inspectors. Civilian/military specialists having explosives safety expertise (e.g., personnel from COMMARCORSYSCOM PM AMMO, NALC and NOSSA for Navy activities) who report to the Lead Inspector during the inspection. Selection of qualified inspectors is determined by COMMARCORSYSCOM.

(3) Fleet Marine Representative. The FMR serves as a uniformed Fleet representative providing liaison between the ESI-CR team and the installation being inspected. FMRs are assigned and responsible to Deputy Program Manager, Ammunition, for Marine Corps Bases or DC(A) (ASB-30) for Marine Corps Air Stations.

(4) Observers. Typically, personnel under instruction to become an FMR, Team Members, personnel from other Commands or Services observing in preparation for their own ESI-CR. Observers are not inspectors and shall only accompany the ESI-CR Team for informational purposes; they do not provide input to findings or programs. COMMARCORSYSCOM must approve all observer requests prior to the inspection. The ESI Lead Inspector will determine when observers may or may not participate in meetings during the ESI-CR.

### 3. Inspected Command Actions

a. Submit the Command's current ESSA Plan/Instruction (do not send the Command's evaluation/findings) via the EES Web Portal at least 30 days prior to the ESI-CR.

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b. Submit a Command Point of Contact list and other necessary documentation as required at least 30 days prior to the ESI-CR via the EES Web Portal.

c. Schedule an in-brief and out-brief with the activity CO or designated representative.

d. Ensure the participation of the ESO, appropriate tenant command representatives and other involved command personnel during the in-brief (e.g., environmental, security, and ammunition inventory management personnel), throughout the ESI-CR, and as required, during the out-brief.

e. Where other stakeholders from outside of the inspected activity's chain of command are present for the inspection, coordinate participation of representatives and notify the applicable ESI-CR Lead Inspector prior to start of the inspection. Representatives at all levels may be present during inspection meetings as determined appropriate by the ESI-CR Lead Inspector and the inspected command's ESO. Representatives may be present at all briefings external to inspection team meetings.

f. Provide the inspection team with administrative assistance, office space, transportation, security access badges, personnel protective equipment, and program representatives as necessary to conduct the ESI-CR.

g. Provide access to documents identified in the command notification letter to the Lead Inspector on the first day of the inspection (electronic copies are acceptable).

4. Deficiency Analysis. Each deficiency will be analyzed using Risk Management (RM) concepts per Volume 2 of reference (b). The analysis is a logic based methodology for identifying accident scenarios, modified to analyze explosives safety deficiencies. It begins with a given initiating event (deficiency) and develops the resulting sequence of possible events. The methodology does not replace subjectivity, but assists in analyzing the routes by which an explosives mishap and/or negative operational impact may occur and provides a standard method for the identification and classification of explosives safety deficiencies.

a. A risk assessment level, based on the potential explosives safety hazard severity, operational impact and explosives mishap probability, will be assigned to each

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deficiency identified. The resulting risk assessment level will assist the ESI-CR Team in determining the overall severity of the deficiency.

b. The assigned risk assessment level will determine if the deficiency is categorized as a finding or discrepancy during the rating process.

(1) Finding. A significant explosives safety violation that can lead, directly or indirectly, to an explosives mishap, result in significant negative operational impact, or significantly deviates from higher headquarters policies and procedures. Violations meeting this criteria will be assigned one of the following risk assessment levels:

(a) EXTREMELY HIGH

(b) HIGH

(c) MEDIUM

(2) Discrepancy. An error or failure to comply with guidance, direction or action as required in appropriate and applicable directives that is assigned a LOW risk assessment level shall be considered a discrepancy.

5. ESI Rating Criteria. The ESI-CR Team will determine the inspected command's compliance with explosives safety criteria and overall explosives safety posture using the following criteria:

a. SATISFACTORY. The ESI-CR Team will recommend an overall inspection rating of SATISFACTORY, provided the Command receives no EXTREMELY HIGH or HIGH findings.

b. SATISFACTORY with UNSATISFACTORY Program. The ESI-CR Team will recommend an inspection rating of SATISFACTORY with UNSATISFACTORY Program if, one of the ten inspected programs receive a HIGH finding within any element of that program or the program is ineffective or nonexistent.

c. SATISFACTORY with UNSATISFACTORY Tenant. The ESI-CR Team will recommend that, although the overall explosives safety rating of the activity is SATISFACTORY, a tenant command's explosives safety program is UNSATISFACTORY.

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d. UNSATISFACTORY. The ESI-CR Team will recommend an overall inspection rating of UNSATISFACTORY if;

(1) The activity receives an EXTREMELY HIGH finding in any program.

(2) The activity receives an UNSATISFACTORY rating in two or more inspected programs.

## 6. Post Inspection Actions

a. ESI-CR Report. The final ESI-CR report will provide a rating of the Command's ESMP, per the inspection rating criteria in paragraph 5 of this Chapter.

(1) COMMARCORSYSCOM will provide the final report, via the EES Web Portal, to the inspected Command within 30 days of the completed inspection.

(2) The inspected Command will submit a Corrective Action Plan (CAP), via the EES Web Portal, within 45 of receiving the final report per Chapter 3 of this Order.

b. ESI-CR Re-inspections. Commands receiving any UNSATISFACTORY rating may require a re-inspection. A determination will be made by COMMARCORSYSCOM as to whether or not the installation/program will be re-inspected. If it is determined that a re-inspection is required, the re-inspection will be scheduled within 180 days of the final dated ESI-CR report.

(1) If available, the re-inspection team will be comprised of the original Lead Inspector and Team Member(s) necessary to evaluate corrective status of the original findings.

(2) The final re-inspection report shall indicate a rating of the Command's ESMP as either being COMPLIANT or NON-COMPLIANT with explosives safety criteria. The re-inspection shall be conducted by evaluating findings identified in the unsatisfactory programs and elements during the initial ESI-CR. Additional, deficiencies in, but not limited to, the unsatisfactory programs and elements inspected, may be identified during the re-inspection.

(3) In the event a command receives a NON-COMPLIANT rating from a re-inspection, a plan will be established in which



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the command will be required to submit bi-weekly progress reports to the respective MCI Regional Command Explosives Safety Office, with a copy to COMMARCORSYSCOM, until the NON-COMPLIANT rating has transitioned to COMPLIANT.

(4) Transition of NON-COMPLIANT ratings to COMPLIANT requires concurrence from both the MCI Regional Command and COMMARCORSYSCOM.

7. Explosives Site Closeout Inspections. Explosives storage facilities being transferred from DoD control must have a Closeout ESI-CR. The Closeout ESI-CR report will be included as part of the explosives safety site approval cancellation request submitted to the Department of Defense Explosives Safety Board.

a. When a Potential Explosives Site (PES) aboard a Marine Corps installation is terminated, the Command shall notify COMMARCORSYSCOM of the need for a Closeout ESI-CR. The Closeout ESI-CR will evaluate the command's level of compliance with closure practices and actions covered in reference (d).

b. Closeout Inspections shall be requested by the command when all A&E material, with the exception of limited amounts of security ammunition, have been removed from all PESs and the host command has conducted an initial inspection in accordance with reference (d).

c. COMMARCORSYSCOM will issue a closeout report, indicating all explosives safety matters have been addressed, to the inspected Command, and Naval Facilities Engineering Command (NAVFAC) at completion of inspection. NAVFAC shall then continue the installation closeout process as appropriate.

### Chapter 3

#### Corrective Action Plan (CAP)

1. Background. A properly executed CAP ensures resolution of all findings and discrepancies documented during the ESI and mitigates the probability of recurrence. A corrective action must be recorded for each deficiency identified in the ESI report. However, root cause determination is limited to findings. Discrepancies identified during the inspection are minor in nature, normally easily corrected and do not require a root cause analysis. A properly executed CAP can significantly increase the effectiveness of the ESMP.

#### 2. CAP Submission

a. An initial CAP with formal documentation indicating CO approval/endorsement must be submitted to COMMARCORSYSCOM via the respective MCI Regional Command for review within 45 calendar days from the date of the signed final ESI report. The initial CAP letter must be uploaded in the EES Web Portal for the inspection reported on under "Inspection Documents." Failure to submit an initial CAP and CO approval/endorsement letter within the prescribed timeframe will result in Command notification from COMMARCORSYSCOM with copies to MCICOM and the activity's chain-of-command, advising of the delinquency.

b. The CAP will be coordinated and submitted by the inspected command's ESO. This coordination requires the ESO to receive corrective actions from organizations and departments located within the command as well as all tenant activities they are responsible for. The ESO of the activity identified as the primary addressee of the ESI-CR report is responsible for compiling the corrective actions for the installation and its tenants. All corrective actions must be posted in the EES Web Portal.

#### 3. CAP Execution

a. Root Cause Analysis. To properly and effectively execute a CAP, the command must first critically examine each finding to determine if it is an isolated occurrence or if there is evidence of a systemic problem. The root cause for each finding will be analyzed using the Human Factors Analysis and Classification System (HFACS) to identify contributory factors that led to the finding. The HFACS concept will assist with identifying latent failures leading to the finding and assist in

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determining an accurate root cause. The HFAC categories, descriptions, factors and factor definitions, modified to analyze explosives safety findings, have been incorporated into the ESI Corrective Action section within the EES Portal. This process only applies to findings, not discrepancies. The following information must be provided prior to submitting the corrective action for approval:

- (1) HFAC Category
- (2) HFAC Description
- (3) HFAC Factor

b. Discussion. Based on the HFACs applied to the finding, the discussion must briefly describe the latent failures or conditions (root cause) that contributed to the finding and whether the finding is considered an isolated or systemic problem.

c. Corrective Action. The action(s) taken to correct the deficiency and prevent reoccurrence must be recorded by the activity. Deficiencies that are in work but not completed, must reflect the status and anticipated completion date. Corrective actions that remain in a pending status will be reviewed quarterly until completed per paragraph 4 of this Chapter.

d. Corrective Action Approvals. The MCI Regional Command Explosives Safety Office will determine when each corrective action is sufficiently completed.

(1) Findings. Corrective actions must meet the CAP execution requirements of paragraph 3. Corrective actions concurred with and accepted by the MCI Regional ESO will be submitted to COMMARCORSYSCOM for final approval. COMMARCORSYSCOM will review and either approve or return the corrective action for additional action or clarification.

(2) Discrepancies. Corrective actions for all discrepancies will be submitted to the Regional ESO for final approval.

#### 4. CAP Quarterly Review

a. CAPs will be subjected to quarterly progress reviews until all outstanding deficiencies are corrected.

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b. The Command shall formally review all findings and discrepancies at least every 90 days to ensure corrective action has been completed or report the current status of the pending corrective action.

c. Corrective actions previously documented as approved in the EES Web Portal require no further reporting.

d. The respective MCI Regional ESO will review all quarterly CAP submissions and ensure corrective actions are completed per the CAP execution process outlined in paragraph 3.

#### 5. Final CAP Submission

a. The MCI Regional Command must submit a final CAP submission letter to COMMARCORSYSCOM when the inspected Command has completed all corrective actions and the corrections have been accepted and approved.

b. COMMARCORSYSCOM will review the final CAP submission and determine if all discrepancies and findings are adequately corrected and in compliance with established orders and directives.

c. Dependent on review, COMMARCORSYSCOM will issue a Final CAP Close-out letter to the inspected Command, via the respective MCI Regional Command, indicating that the final CAP is approved. Once the final CAP is approved, the ESI-CR will be closed and archived in the EES Web Portal.

## Chapter 4

### Explosives Safety Compliance Reviews

1. Scope. The Explosives Safety Compliance Review (CR) is conducted concurrently with the ESI. The CR ensures the existence and maintenance of safe A&E handling and storage environments. Policy for establishment of the ESI-CR Team is defined in Volume 8 of reference (b).
2. Program Objectives. The effectiveness of current explosives safety criteria, in relation to the safe and environmentally-compliant handling, storage, and transportation of A&E conducted at Marine Corps activities is evaluated during the ESI. Specific objectives of the CR, beyond the scope of the ESI, include the following:
  - a. Review explosives safety deviations (e.g. waivers, exemptions, Secretarial Certifications), and problem areas, to achieve balance between operational readiness and safety, and make recommendations to COMMARCORSYSCOM for approval, continuation, or cancellation of deviations.
  - b. Validate on-base public traffic route (PTR) exposures and roll-on/roll-off (RORO) operations.
  - c. Re-validate Safety Assessment for Explosives Risk (SAFER)-issued site approvals (5-year intervals).
  - d. Conduct audits of ongoing munitions response actions to include, at a minimum, Explosives Safety Submission (ESS) compliance, health and safety plan execution, personnel qualification, and quality assurance per Chapter 6 of this Order.
  - e. Review all planned construction and activity planning initiatives, to assure preservation of operational capabilities, respective to Explosives Safety Quantity-Distance (ESQD) separation requirements and correction of criteria deviations.
3. Compliance Review Responsibilities. The CR will be conducted by the COMARCORSYSCOM ESI-CR Team. The Team may be augmented by individuals with specific backgrounds from various commands based on the known issues identified at the activity. The composition of each team and the extent of participation by each command may vary for each review.

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a. COMMARCORSSYSCOM. The CR will be coordinated by the ESI-CR Lead Inspector or Team Member designated by the Lead Inspector. This individual will manage, plan, and conduct the review process and evaluate its effectiveness. The Team Lead will preside over all meetings, guide the team in identifying and addressing all explosives safety issues, and ensure all commands involved are provided sufficient access. All deficiencies, recommendations, and summaries will be included as enclosure (3) of the ESI-CR Report.

b. Regional Explosives Safety Office. The Regional explosives safety office will provide an individual to represent the interest of the region. This individual will assist the activity with coordinating the review, including preparation for independent reviews, in-briefs/out-briefs, interface with all tenant commands and logistical arrangements pertaining to the conduct of the CR. The regional representative will coordinate and confirm the timely submission of activity documentation requirements to the ESI-CR Team, per the ESI-CR notification message and Volume 8 of reference (b).

c. Commandant of the Marine Corps (DC I&L/LFF). Installation and Logistics Facilities Branch (LFF) may provide an individual(s) familiar with facilities planning management, information on project status and overall planning initiatives. LFF representation assists the ESI-CR team with ensuring the installation product team has a Unified Facilities Criteria (UFC)-compliant Master Plan, as it pertains to explosives safety, per reference (h). Coordination with the ESI-CR Team Lead will be accomplished to ensure representation for critical issues.

d. Installation Commanders. Provide representation and required content per paragraph 5.

e. Additional personnel may be added by the Team Lead, in order to obtain specific expertise.

4. Compliance Review Procedures. The ESI-CR process provides a unique opportunity for activities and commands to develop corrective actions for existing, as well as potential explosives safety issues. At a minimum, installation facility planners must attend the review and debriefing meeting. If, during the review, continuance of a Secretarial Certification is being requested, it is imperative that the Commander/Commanding Officer or designated representative attend the review and

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debriefing meeting. The following procedures define the responsibilities of the activity being reviewed:

a. In-brief. The Lead Inspector or designated representative for each CR will hold a meeting with representatives from the activity/region. A copy of the in-brief and any other amplifying information can be uploaded on the EES Portal under Inspection Documents for the ESI-CR being conducted. The following content must be provided by the activity:

(1) Command overview and brief of mission and explosives operations conducted.

(2) An installation map, depicting all existing A&E-related sites and associated ESQD arcs, including on-base ammunition routes. A brief discussion on the handling methods used at each ammunition handling site (pier, CALA, transfer facility) should be included.

(3) Review of all planned new construction, or major building modification, within 110% of inhabited building distance ESQD arcs, or associated with A&E operations. The status of site approvals for these projects must be addressed. Considerations given to environmental aspects of the project shall be addressed.

(4) Current status on the requirement for each deviation (waiver, exemption, Secretarial Certification, RORO, PTR, SAFER). A brief summary should address the nature of the explosives operation; operational requirements necessitating its need; alternatives considered to eliminate or minimize the deviation; and actions underway to eliminate its need (include specific projects, with construction date or program years). Positive, current action towards correction is essential, in obtaining continuation of waivers.

b. Requests for a new deviation, and revalidation documentation for continuation of existing deviations, shall be prepared in accordance with Volume 8, Appendix D of reference (b). Any additional problem areas proposed for discussion during the review will be prepared in the following format:

NOTE: This format is not a substitute for requesting authorization under an established process such as a site approval or event waiver.

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(1) Description of specific explosives safety situation or problem area.

(2) Analysis of problem, in terms of operational readiness requirement, degree to which reasonable safety criteria are deficient or unacceptable, and frequency of problem or hazard.

(3) Assessment of effect if problem is not corrected.

(4) Estimated cost to correct problem.

(5) A copy of local command instructions concerning explosives safety, explosives handling, and Hazards of Electromagnetic Radiation to Ordnance (HERO) precautions.

(6) Information on an existing Secretarial Certification shall be provided, per Volume 8, Chapter 3 of reference (b).

c. Site Visits. After the review meeting, the Team may visit the sites with the activity to gain a perspective of the issues or proposed projects discussed during the meeting. The Team may also verify that conditions of existing deviations have not changed since the last review. Following on-site visits, the Team will prepare recommendations for each deviation, (waiver, exemption, Secretarial Certification), RORO, SAFER site plan, problem area, or significant issue the Team feels requires attention. The Team Lead will provide this information to the installation commander during the ESI-CR out-brief and include the recommendations as an enclosure to the ESI-CR report.

d. Deviation Cancellations. Existing waivers, exemptions or Secretarial Certifications may be recommended for cancellation based on the following:

(1) Conditions that initiated the need for the deviation have changed and the deviation is no longer required.

(2) Mitigating controls have been put in place eliminating the need for a deviation.

(3) No corrective action has been taken to eliminate or mitigate the need for the deviation.

(4) If justification for an existing waiver/exemption or Secretarial Certification is inadequate, the ESI-CR Team shall recommend cancellation of the waiver/exemption, or Secretarial



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Certification. If any command or activity involved objects to such action, the objection shall be submitted to COMMARCORSYSCOM, via the chain-of-command, in the activity's letter forwarding the ESI-CR Team recommendation. Final resolution will be made by COMMARCORSYSCOM.

5. Post-Review Deviation Submissions. A request for deviation renewal/cancellation package must be submitted via the EES Web Portal, per the instructions specified in the ESI-CR report. The package must be submitted to COMMARCORSYSCOM, via the chain-of-command, within 45 working days of the date of the signed ESI-CR report. Deviation submission packages not received within 45 days will receive notification of delinquency from COMMARCORSYSCOM via the activity's chain-of-command. This action is intended to prevent expiration of the deviation thus jeopardizing operational readiness. If no action is taken after 90 days, final notification and deviation cancellation proceedings will be initiated per Volume 8 of reference (b).

## Chapter 5

### Explosives Safety Evaluations

1. Background. In addition to the ESI-CR, the following evaluations shall be conducted as directed by Volume 8 of reference (b).

2. ESMP Evaluations. COMMARCORSYSCOM will conduct ESMP evaluations of Marine Corps Operating Forces, Marine Corps Reserve Forces, and MCI Regional commands. ESMP evaluations are programmatic and objectively assess the effectiveness of the explosives safety responsibilities outlined in references (b), (d), and (e). Commands will be evaluated concurrent with the installation ESI-CR of the same geographic location.

a. Service Component Commanders will be evaluated to ensure the ESMP is integrated into operational and exercise planning and execution of operations per reference (e).

b. COMMARFORRES will be evaluated for Explosives Safety Compliance Program management and oversight functions for Marine Reserve activities. Reserve activity ESI-CRs will be coordinated between COMMARCORSYSCOM and COMMARFORRES via separate correspondence.

c. MCI Regional Commands will be evaluated for ESMP management and oversight functions for their respective region during the ESI-CR.

d. Official notification of ESMP evaluations, with the exception of MCI Regional Commands, will be provided via separate correspondence. Specific coordination and tasking requirements will be identified and provided as part of the official notification.

3. Installation MCI Regional Command Evaluations

a. The MCI Regional Command is required to conduct and document an explosives safety evaluation on each installation within the respective region not less than every 18 months.

b. Findings and discrepancies identified during the evaluation and corrective actions taken, will be recorded in the EES Web Portal as a self-inspection and meet the Deficiency Analysis and Root Cause Analysis criteria contained in Chapter 2 and Chapter 3 of this Order.

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c. Corrective action approval authority for all findings and discrepancies resides with the MCI Regional ESO.

d. MCI Regional Command Evaluations will be audited as part of the COMMARCORSYSCOM Regional Explosives Safety Evaluation.

4. Explosives Safety Self-Assessment (ESSA). The ESSA is the formal program by which installations conduct on-going appraisals of A&E operations to determine the effectiveness of their ESMP. The ESSA shall promote the highest standards of explosives safety integrity and compliance, while applying the precepts of RM. The ESSA must be a continuous process and shall not be conducted solely in anticipation of an ESI-CR or any such evaluation. A complete ESSA will be conducted by each installation on an annual basis.

a. The ESSA will be a formal written program. ESSA format and content are at the discretion of the ESO. However, the most current version of the Explosives Safety Evaluation Guide located on the MAKE library under EES should be adapted to meet installation specific requirements and used as a baseline guide.

b. The ESSA must be conducted on all installation commands, including tenant commands that store, handle, or transport A&E. The ESSA program must include the following minimum elements:

(1) The installation ESO, in conjunction with unit personnel, must perform annual reviews of all elements of the munitions mission to address the functional areas, audit methodology, process quality control, and corrective actions.

(2) Establish a process to ensure inspection results are:

(a) Properly analyzed.

(b) Unfavorable causes and trends are identified.

(c) Findings are tracked and formally closed out when corrections have been completed.

(3) Findings and discrepancies identified during the ESSA and corrective actions taken, may be recorded in the EES Web Portal as an installation self-inspection at the discretion of the ESO.

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(4) The ESO shall provide recommendations and solutions to facilitate corrective actions, ensure corrective actions are accomplished to preclude reoccurrence, and ensure a comprehensive ESMP is achieved.

(5) Commands shall incorporate regional, local, and activity specific requirements, such as explosives storage compensatory measures and locally imposed explosives safety criteria, which are not listed in the Explosives Safety Evaluation Guide in order to increase ESSA effectiveness.

(6) In cases where operational tempo, lack of available personnel, deployments, or other constraining factors preclude ESO assessments, evaluations conducted by unit Explosive Safety Representatives (ESRs) may be considered as part of the ESSA process to avoid duplicative inspection efforts.

(7) At the conclusion of the review, a final report of findings and recommended corrective actions will be prepared by the ESO and provided to each organization inspected and the installation commander.

(8) ESSA reports will be maintained in accordance with Record Schedule 8000-14.

c. The ESSA will be evaluated not less than every 18 months by the respective MCI regional explosives safety office during regional audits.

5. Technical Assist Visits (TAV). A TAV is an evaluation requested by the unit or directed by a senior commander. The results will be used exclusively for the purpose of training unit personnel and will not be used to compare or to provide the basis of an evaluation of past performance. MARCORSYSCOM EES is authorized to provide technical assistance visits to commands requiring support in the administration of their ESMP. This assistance is categorized as either a Command Requested TAV or Directed TAV.

a. Command Requested TAVs are available in situations where a command's ESMP degrades to marginal levels and the Commander, CO or OIC requests assistance to restore the ESMP. In such cases, the command may request a MARCORSYSCOM EES TAV or Regional ESO TAV through official correspondence. These visits will be approved on a case-by-case basis.

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b. Directed TAVs are typically provided in situations where a command's ESMP degrades to marginal levels and higher headquarters has lost confidence in the staff to restore the ESMP. In such cases, MARCORSYSCOM EES will schedule a Directed TAV conducted by the MARCORSYSCOM EES Branch or direct the Region ESO to assist the command with identifying program deficiencies and restore the ESMP to an acceptable level.

## Chapter 6

### Munitions Response Site (MRS) Audits

1. Background. COMMARCORSYSCOM provides MRS project execution oversight through the MRS audit program to ensure compliance with the munitions response criteria set forth in Volume 8 of reference (b).

#### 2. Scope

a. COMMARCORSYSCOM shall audit selected MRSs to assess the extent to which the project complies with applicable environmental, safety, and occupational health requirements related to the management of munitions or explosives of concern (MEC) and/or material potentially presenting an explosive hazard (MPPEH). Sites selected to be audited shall be at the discretion of COMMARCORSYSCOM. The NAVFAC Project Manager may also request a COMMARCORSYSCOM MRS audit in order to satisfy a specific project goal, such as receiving COMMARCORSYSCOM verification. Based on project specifics or other factors COMMARCORSYSCOM may determine that an audit is not required.

#### b. Notification

(1) At least 30 days in advance of the MRS audit COMMARCORSYSCOM shall provide the NAVFAC Project Manager written notification, with a copy to other cognizant Navy activities. There may be circumstances when less than a 30-day notice is given. Once notified, the NAVFAC Project Managers shall coordinate the MRS audit with the designated ESO, the UXO contractor or other munitions response personnel, and other cognizant activities or personnel. The NAVFAC Project Manager shall take necessary steps to ensure the UXO contractor supports the MRS audit.

(2) Ongoing MRSs that are active during an ESI-CR will be audited as part of the Compliance Review and included as part of the ESI-CR report.

#### c. Execution

(1) Audits will review the following, as applicable: ESS; Project Plan, Work Plan, SOPs, Quality Control Plan (QCP), Quality Assurance Project Plan (QAPP), etc.; site-specific health and safety plan; environmental protection plan; and UXO worker qualification and certification documents.

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(2) Audits will observe the following operations and procedures, as applicable: general explosives safety practices; explosives transportation and storage; occupational safety and health practices; quality control (QC) and quality assurance (QA) programs; exclusion zone (EZ) management; environmental compliance; geophysical instrument checkout and use; anomaly detection and identification; manual/ mechanized MEC and/or MPPEH removal; MEC treatment/disposal; MPPEH management; and data management.

(3) The MRS audit guide is integrated with the Marine Corps Explosives Safety Evaluation Guide, Program 07, available electronically in the MAKE library under EES.

### 3. Reporting Requirements

a. COMMARCORSYSCOM will provide an audit report to the NAVFAC Project Manager within 30 days of the completed MRS audit.

(1) The MRS audit report will document each finding and assign a risk assessment level, based on the potential explosives safety hazard severity and explosives mishap probability. The resulting risk assessment level will assist the auditor in determining the overall severity of the deficiencies and rate the project as SATISFACTORY or UNSATISFACTORY. COMMARCORSYSCOM encourages NAVFAC Project Managers to consider the COMMARCORSYSCOM audit rating and findings in their performance evaluation of the UXO contractor.

(2) The COMMARCORSYSCOM Audit Report is considered a document internal to the DoD. In order to protect UXO contractor business-sensitive information (including proprietary data, documents, and personnel records) from unauthorized disclosure, COMMARCORSYSCOM will limit distribution to the NAVFAC Project Manager and courtesy copy addressees only. Additionally, the COMMARCORSYSCOM auditor will control notes and preliminary reports.

b. The NAVFAC Project Manager must respond to COMMARCORSYSCOM, via the EES Web Portal, within 45 days of receipt of the MRS audit report. The response shall address each discrepancy, including corrective actions taken. Comments and observations need not be answered. If the NAVFAC Project Manager wishes to refute any discrepancy, they shall provide sufficient justification and substantiation. Failure to provide

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a response to the MRS audit will preclude COMMARCORSYSCOM from closing out the MRS audit report and providing the NAVFAC Project Manager formal COMMARCORSYSCOM verification.



Chapter 7

Inspection and Evaluation Schedule

1. Scope. COMMARCORSYSCOM will schedule ESI-CRs and ESMP Evaluations on a biennial basis. This 24-month cycle may be extended or compressed when determined appropriate by COMMARCORSYSCOM.

2. The following commands/installations are subject to ESI-CRs or ESMP Evaluations. These lists are not all encompassing:

a. ESI-CR. The following commands/installations are subject to an ESI-CR:

MCB Quantico	MCAS Yuma
MCAF Quantico	MCAS Miramar
MARBKS, WASHDC	MCRD San Diego
MCB Camp Lejeune	MCLB Barstow
MCAS Cherry Point	MCMWTC Bridgeport
MCB Camp Butler	MCAGCC 29 Palms
MCAS New River	MCAS Futenma
MCAS Beaufort	MCB Hawaii
MCRD Parris Island	MCAS Iwakuni
MCSF Blount Island	CATC Camp Fuji
MARDET NWS Charleston (TBD)	MARFORK/Camp Mujuk
MCLB Albany	MCA Guam (TBD)
MCB Camp Pendleton	MAG 49 Joint Base McGuire NJ
MCAS Camp Pendleton	MAG 49 Stewart ANGB NY

b. ESMP Evaluations. The following commands/installations are subject to an ESMP Evaluation:

MARFORPAC	MARFORK	MCI NCR
MARFORRES	MARCENT	MCI EAST
MARFORCOM	MARFORSOUTH	MCI WEST
MARFOREUR/AF	MCPN-Norway	MCI PACIFIC

4. Inspection/Evaluation Rescheduling. Rescheduling an Inspection/Evaluation is highly discouraged. If a command finds it necessary to reschedule their Inspection/Evaluation, it shall do so at the earliest opportunity available. Commands must submit a formal letter to COMMARCORSYSCOM, justifying the request for the delay. COMMARCORSYSCOM will approve or deny the request.